

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Amendment of Part 97 of the)
Commission's Rules to Set)
Aside a portion of the)
Amateur 222 to 225 MHz Band)
for Other than Repeater Use, and)
Amend the Rules Relative)
to Novice Privileges)

PR Docket 92-289

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COMMENTS BY ROBERT J. CARPENTER, ROCKVILLE, MD.

I, Robert J. Carpenter, have been a licensed radio amateur since 1948 and hold Advanced Class license W3OTC. I have operated all amateur bands from 80 meters through 70 cm except for the WARC bands, although my main interest in amateur radio has long been concentrated on the bands above 50 MHz. I have contacted all 50 states on the 50 MHz band, 38 states on the 2 meter band, and a half-dozen or more states on both the 220 MHz and 432 MHz bands. Single sideband (SSB) or Morse code (CW) was used for these contacts, not FM nor repeaters. I do, however, operate FM on both 144 and 440 MHz, and packet radio on the 144 MHz band.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I feel that the Commission is acting correctly in proposing to reserve a portion of the 222 - 255 MHz band for non-repeater use. It is essential that a section of this very limited-width band remain available for weak-signal / narrow-band work, which this proposal should accomplish.

Many VHF amateurs regularly use the 222 MHz band for long distance terrestrial communication, only possible using the weak-signal / narrow-band transmission modes such as SSB and CW. The use of this band for the "ultimate" in amateur communication, using reflection from the moon, has been severely impacted by the continuing threats of reallocation, and the recent reduction in the band's width. A station capable of communicating by the moon requires the investment of a year or more of spare-time effort, and a very substantial sum of money, on the part of the amateur. Few people are willing to make this commitment unless the Commission can guarantee some sort of stability, as well as a portion of the band protected from repeater encroachment. The Commission's present proposal to reserve at least a small portion of the band goes a long way toward providing this encouragement.

Prior to the Commission's removal of the 220-222 MHz portion of the band from the Amateur Service, 500 kHz (220.0 to 220.5 MHz) was established by the ARRL band plan for CW, SSB and similar narrow-band / weak-signal techniques. Furthermore, the Commission's Rules prohibited repeater stations from employing this portion of the band. With the loss of the lower 2 MHz of the band, a number of repeater operators, especially in southern California, have expressed the opinion that the remaining 3 MHz wide band is fully required for repeater operation; ie. only their (repeater) interests should use the 222-225 MHz band. One proposal went so far as to suggest that CW/SSB might be allowed to utilize just the 10 kHz from

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222.00 to 222.01 MHz. However, with the sidebands from their first repeater channel centered at 222.02 MHz, even that tiny band would be useless for weak-signal work.

I feel that all users must make appropriate adjustments to accommodate the wide range of interests of existing users of this very valuable and interesting band. Forty percent of the band was lost to amateur use by the re-allocation, which could imply that each type of operation should be left with roughly sixty per-cent of the space previously set aside. The Commission, following ARRL Petition RM-7869, has proposed 150 kHz for non-repeater operation. This is thirty per-cent of the 500 kHz which was previously available to narrow band/weak signal modes. Thus the weak-signal users of the band have lost 70 percent of their portion of the band, while the other users have lost only about 48 percent of their former subband. I would prefer a wider segment reserved for non-repeater use, say 300 kHz, so that each subclass of user would lose proportionally.

In spite of these comments I support the Commission's proposal as contained in this NPRM. I strongly oppose any attempt to reduce the width of this already-narrow segment.

The Commission also proposes to allow Novice Class licensees to use the entire 222 to 225 MHz band. I welcome SSB/CW operation by Novice licensees. This will be the only portion of the VHF spectrum where Novices are allowed to operate in band segments in which weak signal/narrow band techniques are used; a valuable source of good experience for them.

As to the proposal to allow Novices to become repeater licensees and/or controllers, I point out that operating a repeater generally requires greater, and different, knowledge than is currently tested in the Novice examination. If the Commission believes that the Novice exam should continue to be a simple entry-level exam, it seems inappropriate to include repeater-control-related questions in that exam. It would seem better to continue to require a Technician Class, or higher, license to establish and control a repeater.

Respectfully submitted this 14th day of February, 1993,


Robert J. Carpenter